

Exhibit 12 to
Declaration of Mark C. Mao
ISO Plaintiffs' Unopposed
Motion for Final Approval of
Class Action Settlement

From: Aly Olson <alyolson@quinnmanuel.com>
Sent: Friday, March 29, 2024 3:53 PM
To: James Lee; Viola Trebicka; Ryan McGee x3030; Beko Richardson; Stephen Broome
Cc: Amanda Bonn; Alex Frawley; Mark C. Mao; Joshua Stein; M. Logan Wright; John Yanchunis x2191
Subject: RE: Brown Briefing Schedule

EXTERNAL Email

Thanks, James.

Here are our comments to the motion. Please let us know if you would like to discuss.

- Document title – Strike “unopposed” from the title.
- Notice of motion – change “Google does not oppose this motion for final approval” to “Google supports final approval of the settlement, but disagrees with the legal and factual characterizations contained in the Motion.”
- Introduction – Add a sentence or footnote stating “Google supports final approval of the settlement, but disagrees with the legal and factual characterizations contained in the Motion.”
- Page 1:4 – Change “data improperly collected” to “data collected” or “data allegedly improperly collected.”
- Page 2:14-15 – Change “This broadly covers data Google collected during the class period from private browsing sessions” to “this includes data Google collected during the class period from private browsing sessions.”
- Page 2:24 – Change “Plaintiffs insisted on retaining class members’ rights to sue Google individually for damages” to “class members’ retained their rights to sue Google individually for damages.”
- Pages 8:9-10; 14:16, 26; 16:5, 8; 18:15; 19:27-28; 20:13-15; 22:24; 24:8-9; 25:10 – Change all references characterizing the settlement as “injunctive relief” to “agreed remediation.”
- Pages 2:22; 6:22; 7:3; 14:1 – Change all references to Google “concealing” information to Google “belatedly disclosing” information.
- Pages 2:13; 2:16; 2:21; 6:18; 10:11; 11:8; 11:16; 12:5; 12:22; 13:19; 13:26 – Change all references that Google “must” comply with the Settlement terms to Google “agreed” to comply with the terms of the settlement.
- Page 11:9 – Change the CPN/whitepaper are “two other misleading Google documents at issue in this lawsuit” to are “two other Google documents at issue in this lawsuit.”

Best,

Aly